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From: HarborComments <HarborComments@epa.gov>
Sent: Friday, July 01, 2016 2:26 PM
To: PortlandHarbor
Subject: FW: Comments to EPA Proposed Plan for Portland Harbor Superfund Site
Attachments: EPA_Proposed_Plan_Comments.pdf

Laura Knudsen

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"Nothing great was ever achieved without enthusiasm" (Ralph Waldo Emerson)

Please Note: I am currently on detail to the EPA Region 10 office in Portland, Oregon until July 23, 2016. Thank you!



From: (b) (6)
Sent: Thursday, June 30, 2016 7:57 AM
To: HarborComments <HarborComments@epa.gov>
Subject: Comments to EPA Proposed Plan for Portland Harbor Superfund Site

Attached please find my comments to the EPA Proposed Plan.

Thank you,

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June 29, 2016

United States Environmental Protection Agency

RE: Comments to Portland Harbor Superfund Site EPA Proposed Plan

The EPA Proposal Plan ("Plan") to clean up the Portland Harbor Superfund Site (lower Willamette River) advances Alternative I as the most cost-effective solution to meet requirements of the clean-up. But there are problems with the discussion of Remedial Alternatives in pages 36 through 48 of the Plan, namely:

1. Capital costs and periodic costs have no supporting documentation indicating how those costs were derived.
2. No engineering duration or costs appear to be included in any of the alternatives.
3. Construction durations have no supporting documentation indicating how those durations were established.

Page 66 of the Plan states, "The technologies of dredging, capping, ENR and MNR have been demonstrated to be technically and administratively feasible at various other Superfund sites." But the Plan provides no information about clean-up of other Superfund sites.

Surely there have been other Superfund sites where at least some of the technologies the EPA proposes in this Plan have been used that would provide real historical data on the actual cost, duration and effectiveness of these technologies to eliminate and/or contain contaminants in similar waterways. Without such supporting documentation, there is no substance to the data promoted in the alternatives the EPA discusses in the Plan. Please provide case studies of all clean-ups similar to that required of the Portland Harbor, the technologies used, costs and duration for both engineering and construction, the results obtained and how these clean-ups compare to alternatives discussed in this EPA Portland Harbor Superfund Proposed Plan. Without this data the public has no way of providing intelligent feedback on this Plan.

Thank you,

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